

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

MUNA AL-SUYID, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:20-cv-00170 (LMB/JFA)
)	
KHALIFA HIFTER, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**DEFENDANT'S MOTION FOR LEAVE
TO FILE AMENDED ANSWER**

Defendant Khalifa Hifter ("Mr. Hifter") respectfully moves this Court, pursuant to Fed. R. Civ. P. 15(a)(2), to enter an order permitting him leave to file the proposed Amended Answer attached as Exhibit 1.

Based on the accompanying Memorandum in Support, Mr. Hifter seeks to add additional information in order to ensure that Plaintiffs are sufficiently on notice of his affirmative defenses. Mr. Hifter also seeks to remove affirmative defenses that he has deemed inapplicable. Leave to amend is liberally construed in the interests of justice. Fed. R. Civ. P. 15(a)(2); *Galustian v. Peter*, 591 F.3d 724, 729 (4th Cir. 2010). Here, that end is met by allowing Mr. Hifter to amend his answer. The Plaintiffs have been on notice of the substance of the defenses that Mr. Hifter will be presenting through the body of his original answer as well as his motion to dismiss. Additionally, this case is just entering into discovery and Mr. Hifter is not seeking to add any new

affirmative defenses. Therefore, the Plaintiffs will not be surprised or prejudiced by the amendment.

Dated: March 25, 2021

Respectfully submitted,

/s/ Jesse Binnall

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of March 2021, I electronically filed the foregoing Motion for Leave to Amend Answer with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel and parties of record.

/s/ Jesse Binnall
Jesse R. Binnall

*Counsel for Defendant Khalifa
Hifter*